

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS EMILY R. ROSENBERG  
(APWU/USPS-T3-20)  
(February 2, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Emily R. Rosenberg (USPS-T-3). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T3-20 Please refer to your response to PR/USPS-T3-6(a), filed January 5, 2012, which states

As for the LogicNet model, at the time of [sic] the model was run, the Postal Service utilized a set list of facilities to choose from, as described in my testimony. Had the Postal Service excluded facilities that were subsequently shut down as part of the AMP process as detailed in the June 2008 Network Plan, the model would not have been allowed to select those facilities as remaining nodes.

Please confirm that this statement means the LogicNet model run did not assume facilities “subsequently shut down” as part of the June 2008 Network Plan’s AMP Process were actually shut down. In other words, the LogicNet Model run was allowed to select as remaining nodes facilities that had been shut down as part of the June 2008 AMP process. If you do not confirm these interpretations, please clarify your PR/USPS-T3-6a response.